

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS (REV.1)

TITLE V SIGNIFICANT REVISION (DRAFT PERMIT) No. V-03-021 R1

DANA CORPORATION-NORTH AMERICAN

SEALING PRODUCTS DIVISION

DANVILLE, KY

SEPTEMBER 27, 2005

MARK LABHART, REVIEWER

SOURCE I.D. #: 21-021-00049

SOURCE A.I. #: 384

ACTIVITY #: APE20050001

SOURCE DESCRIPTION:

The DANA Corporation-North American Sealing Products Division at 500 Techwood Lane in Danville (Boyle County), manufactures automotive steel gaskets. Their Title V permit was issued June 27, 2003. The facility is now applying for the addition of a new gasket coating line, similar to two Multi-Layer Steel (MLS) gasket production lines already permitted at this facility. Each line will consist of a series of coating applicators and drying ovens. Emissions from the new facilities will be vented to the existing Compact Valveless Regenerative Thermal Oxidation (VRTO) System. Also the Electric Batch Oven, originally permitted as EP03 (EU-22) has been removed from the facility so this equipment has been deleted from the permit. The net increase PTE is approximately 59.1 tpy for VOC and 0.33 tpy for HAPs.

PERMIT REVISIONS:

Added emissions points;

Controlled

- (26) Primer Oven / Single Applicator – MLS Line 3
- (27) 14 micron Oven / Two Applicators – MLS Line 3
- (28) 30 micron Oven / Single Applicator – MLS Line 3
- (29) Antistick Oven / Single Applicator – MLS Line 3

Uncontrolled

- (25) Aqueous Wash Vent – MLS Line 3

COMMENTS:

- Potential to Emit is based on the minimum 85% control requirement of the applicable regulation, 401 KAR 59:225, *New Miscellaneous Metal Parts and Products Surface Coating Operations*.
- There are currently no National Emission Standards for Hazardous Air Pollutants (NESHAPs) regulations that apply to the source. This source is not major for HAP.

- The permittee shall test to demonstrate capture efficiency of the new equipment and the destruction efficiency of the VRTO with the increased exhaust flows associated with the new equipment.

EMISSION AND OPERATING CAPS DESCRIPTION:

Emission Limitations. Pursuant to 401 KAR 59:225, Section 3, emissions discharged into the atmosphere from the coating lines shall be no more than fifteen (15) percent by weight of the VOCs net input into the affected facility.

Operating Limitations. Performance testing will determine the minimum combustion temperature for the VRTO and the minimum average gas volumetric flow rate or duct static pressure for each specific capture device in the capture system. Additionally, emissions from all processes listed in the permit as a portion of the coating lines shall be vented to the VRTO at all times, and the VRTO shall be operational at all times that one or more of the coating lines is operating.

PERIODIC MONITORING:

See the permit for Specific Monitoring Requirements.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.